OF CALIFORNIA

180 HOWARD STREET SAN FRANCISCO, CALIFORNIA 94105-1639 TELEPHONE (415) 538-2000

November 6, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, SAMUEL DAVID HOUGH, #234886 was admitted to the practice of law in this state by the Supreme Court of California on December 17, 2004; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert

Custodian of Membership Records